

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PROJECT VERITAS ACTION FUND,

Plaintiff,

v.

DANIEL F. CONLEY, in his official
capacity as Suffolk County District
Attorney,

Defendant.

C.A. No. 1:16-cv-10462-PBS

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 83.5.2(c), attorney Gregory D. Cote respectfully requests that the Court grant him leave to withdraw as co-counsel for Plaintiff, Project Veritas Action Fund ("PVA").

Granting this motion is necessary and warranted because Attorney Cote recently accepted a position in the public sector and is leaving the law firm McCarter & English, LLP in short order. The relief requested herein will not impose any material adverse effect, let alone hardship, on PVA because attorneys Daniel J. Kelly of McCarter & English, LLP, and Stephen R. Klein and Benjamin Barr of Statecraft PLLC previously appeared as co-counsel for PVA and will continue to serve as counsel of record for PVA. Nor will allowance of this motion impose prejudice on any party because no trial date has been set and dispositive motions are fully briefed and remain outstanding. Moreover, the undersigned conferred with counsel for Defendant, Daniel F. Conley ("Conley"), pursuant to Local Rule 7.1(a)(2) and is authorized to represent that Conley does not object to the relief requested herein.

8/15/18

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Paul S. Fares